

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ARGELIA SOLITO,)	
)	
)	
Plaintiff,)	
)	Case 1:23-cv-03438-MLB
VS.)	
)	
SAM’S EAST, INC., JOHN DOE 1-)	
2, ABC CORP., and XYZ CORP.,)	
Defendants.)	

**PLAINTIFFS’ RESPONSE IN OPPOSITION TO DEFENDANT’S
MOTION FOR SUMMARY JUDGMENT**

COMES NOW, the Plaintiff, pursuant to Fed. R. Civ. P. 56, L.R. 7.1, LR 5.1, and L.R. 56, and hereby files this Response to Defendant Sam’s East, Inc.’s Motion for Summary Judgment. Plaintiff requests this Honorable Court for an Order denying Defendant Sam’s East, Inc.’s Motion for Summary Judgment as there are issues of material fact which would preclude summary judgment under the law.

In opposition to the Defendant’s Motion for Summary Judgment, the Plaintiff relies upon the deposition of the Plaintiff, Argelia Solito, the declaration of Cody Speck, the Brief in Opposition to Summary Judgment, all pleadings of record, all documents of record, and all evidence properly before the Court.

[SIGNATURE BLOCK ON THE FOLLOWING PAGE]

Respectfully submitted this 21st day of June, 2024.

**770GOODLAW, CAR
ACCIDENT LAWYERS,
LLC.**

/s/ Hung Q. Nguyen
Hung Q. (Alex) Nguyen, Esq.
Georgia Bar No.: 940370
Attorney(s) for Plaintiff

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1 D

By signature below, counsel certifies that the foregoing document was prepared utilizing 8½” x 11” page with Times New Roman, 14-point font, double spaced, single sided, not containing more than 10 characters per inch of type, margins and page numbering all in compliance with Local Rules 5.1 (C)-(L), and 7.1(D).

Respectfully submitted this 21st day of June, 2024.

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CERTIFICATE OF SERVICE

I certify that I have electronically filed the **Plaintiff's Response in Opposition to Defendant Sam's East, Inc.'s Motion for Summary Judgment** with the Clerk of Court using CM/ECF (Pacer) system which will automatically send email notification of such filing to the following attorney of record.

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Respectfully submitted this 21st day of June, 2024.

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